

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS

MALIBU MEDIA, LLC,  
Plaintiffs,

v.

JANICE HARTGROVE -FREILE,  
Defendant.

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Civil Action Case No. 4:18-cv-00209

**ANSWER**

Defendant Janice Hartgrove-Freile (“Defendant” or “Freile”) answers Plaintiff Malibu Media, LLC’s (“Plaintiff” or “Malibu”) Complaint as follows:

1. Defendant admits the assertion made in Paragraph 1 of the Complaint.
2. Defendant denies the assertion in Paragraph 2 and states that she has never infringed Plaintiff’s copyrights.
3. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 3.
4. Defendant admits the jurisdictional allegation in Paragraph 4.
5. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 5.
6. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 6.

7. With respect to Paragraph 7, Defendant denies any events occurred that would give rise to the claim by Plaintiff against Feile, but admits she resides and can be found in this District.

8. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 8.

9. Defendant admits the allegation in Paragraph 9.

10. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 10.

11. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 11.

12. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 12.

13. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 13.

14. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 14.

15. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 15.

16. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 16.

17. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 17.

18. Defendant denies possessing any computer file belonging to Plaintiff. With respect to the remainder of Paragraph 18, Defendant lacks knowledge or information to form a belief about the truth of those allegations.

19. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 19.

20. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 20.

21. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 21.

22. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 22.

23. Defendant denies the allegation stated in Paragraph 23.

24. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 24.

25. Defendant denies the allegation stated in Paragraph 25.

26. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 26.

27. Defendant lacks knowledge or information to form a belief about the truth

of the allegations in Paragraph 27.

28. Defendant admits the allegation in Paragraph 28.

29. Defendant lacks knowledge or information to form a belief about the truth of the allegations in Paragraph 29.

30. Defendant denies the allegation in Paragraph 30.

31. Defendant denies distributing Plaintiff's works, but lacks knowledge or information to form a belief about the truth of the remaining allegation in Paragraph 31.

32. Defendant denies the allegations in Paragraph 32.

33. Defendant denies the allegation in Paragraph 33.

Defendant respectfully requests that the Court deny the relief Plaintiff seeks, award Defendant court costs and attorney's fees, and grant other and further appropriate relief.

Dated: May 29, 2018

Respectfully submitted,

STEWART & WILEY, PLLC

By: /s/ Rob L. Wiley

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ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document was served through the PACER system by e-mail and regular mail on the 29 day of May, 2018, upon:

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/s/ Rob L. Wiley  
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